

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

)
UNITED STATES OF AMERICA and)
THE STATE OF WISCONSIN,)
)
)
Plaintiffs,) Civil Action No. 10-C-910
)
v.) Hon. William C. Griesbach
)
NCR CORPORATION, *et al.*)
)
Defendants.)
)

**DECLARATION OF KRISTIN M. FURRIE IN SUPPORT OF PLAINTIFFS' MOTION
FOR A PROTECTIVE ORDER REGARDING MENASHA CORPORATIONS FED. R.
CIV. P. 30(b)(6) DEPOSITIONS**

I, Kristin M. Furrie, declare as follows:

1. I am a Trial Attorney with the Environmental Enforcement Section of the United States Department of Justice. I have served as counsel for the United States on matters concerning the Lower Fox River and Green Bay Superfund Site since 2011.
2. Exhibit 1 to this Declaration is a true and correct copy of the Notice of Deposition to the United States pursuant to Fed. R. Civ. P. 30(b)(6) served by Menasha Corporation (“Menasha”) on August 1, 2012.
3. Exhibit 2 to this Declaration is a true and correct copy of the Notice of Deposition to the State of Wisconsin pursuant to Fed. R. Civ. P. 30(b)(6) served by Menasha Corporation (“Menasha”) on August 1, 2012.
4. Exhibit 3 to this Declaration is a true and correct copy of the Plaintiffs United

States of America's and the State of Wisconsin's Responses and Objections to Defendant Menasha Corporation's Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6), served on August 15, 2012.

5. Exhibit 4 to this Declaration is a true and correct copy of the Plaintiffs United States of America's and the State of Wisconsin's Amended Responses and Objections to Defendant Menasha Corporation's Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6), served on August 16, 2012.

* * * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: August 20, 2012

s/ Kristin M. Furrie

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this day, the foregoing Declaration was filed electronically with the Clerk of the Court using the Court's Electronic Court Filing System, which sent notification of such filing to the following counsel:

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Dated: August 20, 2012

s/ Kristin M. Furrie